

**Montana Special Account Technical Assistance Cooperative Agreement**

**V-96822901**

**Support Agency Assistance Application Amendment**

**SFY 2018**

**Special Accounts Grant Application Narrative**

**July 1, 2017 – June 30, 2018**

Montana Department of Environmental Quality

Waste Management and Remediation Division

Helena Montana

For the

U.S. Environmental Protection Agency

Region VIII

Denver, Colorado

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## ***INTRODUCTION***

This Multi-Site Technical Assistance Cooperative Agreement (TACA) application requests funding for the Montana Department of Environmental Quality (DEQ) Superfund Program to provide technical assistance for state participation in the federal Superfund Program authorized in the 1986 Superfund Amendment and Reauthorization Act. For SFY 2015, the agencies agreed to request a separate grant for Technical Assistance for special account sites. This TACA application amendment will support DEQ's site specific activities for Environmental Protection Agency (EPA) lead NPL sites in Montana from July 1, 2017 through June 30, 2018.

## ***SUPPORT AGENCY ACTIVITIES***

The Waste Management and Remediation Division (WMRD) manages DEQ's Superfund mission through the Federal Superfund and Construction Bureau and the Contaminated Site Cleanup Bureau. WMRD staff from both bureaus work on federal Superfund cleanup activities under the CORE cooperative agreement, the Multi Site Cooperative Agreements (MSCA), and Technical Assistance Cooperative Agreements (TACA).

The intent of DEQ in this support agency role is to enhance progress at all EPA Lead sites by providing technical, legal, and managerial resources to the EPA, as well as articulating any issues of the State and US Forest Service concern, and promoting state and local involvement in the site remediation process.

To facilitate fund management DEQ and EPA have agreed to provide specific TACA for the Carpenter Snow Creek Site and the Butte Mine flooding site. Remaining special account EPA lead sites technical assistance requests are included in within this Cooperative Agreement request.

## ***STATEMENT OF WORK (SOW) TO PROVIDE TECHNICAL ASSISTANCE***

DEQ, under this TACA, will provide intergovernmental agency agreement coordination and contracted services management as needed by the agencies. Site-specific narratives describe commitments for each site.

### **Intergovernmental Agency Agreement Coordination/Contracted Services Management**

#### **Commitment 1 - Define Technical Expertise Requirements**

Outputs: Identify governmental, nonprofit, and private consultants with expertise in several areas including geochemistry, hydrogeology, statistics, quality assurance, GIS, soils, agriculture, fisheries, laboratory capabilities, and legal assistance. Conduct discussions and negotiations with the EPA to define the scope of technical work and acceptable costs.

#### **Commitment 2 - Prepare and Administer Intergovernmental Agency Agreements**

Outputs: Enter into agreements with governmental, nonprofit, and private consultants for approved assignments. Monitor commitment order progress and fiscal accountability.

### Commitment 3 - Review and Comment on Documents

Outputs: Provide review of deliverables obtained through intergovernmental agency agreements to ensure quality and acceptability of work effort.

### Commitment 4 - Procure and Manage Contractor Services

Outputs: Procure and manage agreements with governmental, nonprofit, and private consultants as needed to fulfill state commitments and to enhance progress on project activities. Examples of services include: technical assistance for project oversight, limited sample collection and analysis activities, court reporting for public hearings, paralegal assistance for cost recovery or administrative record preparation, office clerical help to photocopy or microfiche documents for EPA use, and financial accountant/auditor for contract compliance evaluations.

Outcome: Enable state ability to enter into and manage IAGs and contracted services to support superfund RI/FS and RD/RA activities.

### **SITE-SPECIFIC WORK PLANS:**

#### ***BN SOMERS***

The BN Somers sites, which is associated with a former railroad tie treating facility operated by Burlington Northern (later renamed BNSF Railway Company), is located on Flathead Lake in the northwestern portion of Montana. The Site is also commonly referred to as the BNSF Former Tie Treating Plant Site in Site documents and is an EPA enforcement-lead project conducted under CERCLA authority. Soil treatment has attained remedial goals and the land treatment unit closure is complete. The agencies established a controlled groundwater area in 2003. Since that time, BNSF has collected quarterly monitoring data in accordance with the Groundwater and provide results to the agencies in quarterly and annual interim monitoring reports.

Review of groundwater data collected during the interim monitoring period showed continuing concentrations down-gradient of the existing controlled groundwater area (CGA). In addition, investigations on or near the recently acquired properties adjacent to the BNSF Somers Site proper indicate that creosote and/or dissolved phase constituents above the cleanup levels established in the USEPA 1989 Record of Decision (ROD) are present in the subsurface beyond the proposed TI boundary and existing Controlled Groundwater Area. As a result of the aforementioned issues, EPA and DEQ have determined that additional work, as defined in the Consent Decree is necessary. The work began in SFY 2015, continued through SFY 2017 and will be on-going in SFY 2018.

New information shows the plume is not stable and the groundwater remedy is not protective of human health and the environment. The vapor intrusion and drinking water pathways have not been fully evaluated, and the current ICs do not cover all areas where contamination is above the ROD cleanup standards for groundwater. Ongoing work scope includes evaluation of

additional remedial strategies as part of a forthcoming Focused Feasibility Study, with decisions to be memorialized thereafter. The Fifth Five Year Review began in 2016 and will be finalized following approval in 2017.

#### Technical Assistance

DEQ previously contracted for preparation of the 5<sup>th</sup> BN Somers Five Year Review. With the finalization of the fifth five year review, DEQ requests limited ongoing technical assistance, to assist with reviews of anticipated focused feasibility studies and decision documentation.

The DEQ is requesting \$26,000.00 to support this work effort.

### ***COLUMBIA FALLS ALUMINUM FACILITY***

The Columbia Falls Aluminum Company, LLC (CFAC) aluminum reduction facility located near Columbia Falls, was operated as a primary aluminum reduction facility (commonly referred to as an aluminum smelter) from 1955 until 2009. Aluminum production at the Site was suspended in 2009 due to a downturn in aluminum market conditions, and CFAC announced the permanent closure of the facility in March 2015. This site was proposed for NPL listing in March 2015 and listed in September 2016.

Phase I Site Characterization was completed between January 2016 and November 2016. The Phase I Site Characterization program was designed to identify and/or confirm source areas and associated chemicals of potential concern (COPCs) outlined in the RI/FS Work, as well as provide a broad characterization of the hydrogeologic conditions and the nature and extent of contamination across the Site and around Site features.

Groundwater and surface water samples will be collected throughout the year to provide a full year of data for evaluation. During FY2018, scoping will be conducted for activities necessary for Phase 2 of data collection for the remedial investigation. DEQ and EPA have concurred on moving the site to the Special Management Assistance Grant and anticipate an increase in the level of effort needed in SFY 2018 to continue assisting EPA with the RI/FS work effort.

#### Technical Assistance

Technical Assistance is needed for support in reviewing sampling plans, summary reports, technical memoranda, and in evaluating any data gaps as the agencies move through the RI/FS work effort. Support will also be needed to review the Risk Assessment work plans anticipated to be received in 2017-2018.

The DEQ SFY 2018 funding request for contractual support is \$67,600.

### ***IDAHO POLE***

The Idaho Pole Company (IPC) pole treating facility is located near Bozeman, Montana. The plant began operation in 1946. In 1992, the DEQ Superfund Program completed a ROD for the site, and in 1993, the Idaho Pole Company began conducting the RD/RA. The facility closed in 1997 and since then the majority of facility structures have been dismantled. RA construction is complete while treatment of groundwater is ongoing. Soil treatment has attained remedial goals and the land treatment unit closure and reclamation has been completed. EPA established a Controlled Groundwater Area in February 2001.

#### Technical Assistance

Pilot scale work is being conducted on the groundwater remedy at the site. DEQ will obtain contractual support for assistance in review and comment on continuing work conducted by the PRPs to apply the decision framework for implementing and monitoring a shut-down test of the P&T system. TA monies will be used to obtain contractual support in reviewing technical documents and modelling that will be required to support a request to permanently discontinue the active pump and treat groundwater remedy.

The DEQ SFY 2018 funding request for contractual support for this site is \$13,520.00.

### ***SILVER BOW CREEK/BUTTE AREA***

#### ***Rocker Timber Framing and Treating Plant Operable Unit***

EPA issued the ROD In December 1995. The Rocker Timber Framing and Treating Plant is approximately seven miles west of the City of Butte along Silver Bow Creek. The facility operated from 1909 until 1957 to preserve wood products with creosote and arsenic using dip and pressure treating methods. ARCO began the RD/RA in June 1996 and completed construction in 1997. The agencies and ARCO signed the consent decree in 2000. EPA and DEQ will work with Atlantic Richfield in developing a better Conceptual Site Model in order to evaluate groundwater characteristics and meet to discuss future activities at the Rocker site.

#### Technical Assistance

DEQ will continue managing a task order with Montana Bureau of Mines and Geology (MBMG) to assist with project oversight. DEQ anticipates that MBMG will assist with evaluation of draft reports, participation in meetings, and continued collection and compilation of groundwater elevation data from pressure transducers installed in select monitoring wells.

The DEQ FFY 2016 funding request for contractual support is \$31,200.00.